

Presentment Date: June 26, 2017 at 12:00 noon (EDT)

Objection Deadline: June 23, 2017 at 4:00 p.m. (EDT)

Hearing Date in the Event of a Timely Objection: July 6, 2017 at 10:00 a.m. (EDT)

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Robert J. Madden (*pro hac vice* pending)
David Sheeren (*pro hac vice* pending)

Attorneys for the Institutional Investors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS, INC., et al.,	: Case No. 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF PRESENTMENT OF ORDER GRANTING
THE INSTITUTIONAL INVESTORS' MOTION TO INTERVENE
IN SUPPORT OF: (A) THE RMBS SETTLEMENT, (B) THE PLAN
ADMINISTRATOR'S 9019 MOTION (ECF 55232), AND (C) ENTRY
BY THE COURT OF THE TRUSTEE FINDINGS AND BAR ORDER**

PLEASE TAKE NOTICE that upon the annexed Institutional Investors¹ Motion to Intervene in Support of: (A) the RMBS Settlement, (B) the Plan Administrator's 9019 Motion (ECF 55232), and (C) Entry by the Court of the Trustee Findings and Bar Order (the "Intervention Motion"),² the undersigned will present the proposed order annexed to the Intervention Motion as Exhibit A (the "Proposed Intervention Order") for signature to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 623, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court") on **June 26, 2017 at 12:00 noon (prevailing Eastern Daylight Time)**.

PLEASE TAKE FURTHER NOTICE that that objections, if any, to the entry of the Proposed Intervention Order must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, be filed electronically in text searchable portable document format (PDF) with the Court in accordance with General Order M-399 (General Order M-399 can be found at www.nysb.uscourts.gov, the official website for the Court), by registered users of the Court's case filing system and by all other parties in interest (with a hard-copy delivered directly to the Judge's Chambers), and be served in accordance with General Order M-399, and upon the following: (i) the chambers of the Honorable Shelley C. Chapman, One

¹ The Institutional Investors are AEGON USA Investment Management, LLC, Blackrock Financial Management, Inc., Cascade Investment, L.L.C., The Federal Home Loan Bank of Atlanta, Goldman Sachs Asset Management, L.P., Invesco Advisers, Inc., Kore Advisors, L.P., Metropolitan Life Insurance Company, Pacific Investment Management Company LLC, SeaLink Funding Limited, The TCW Group, Inc., Thrivent Financial for Lutherans, Voya Investment Management, and Western Asset Management Company.

² Capitalized terms used but not defined herein have the meanings given to them in the Intervention Motion.

Bowling Green, New York, New York 10004, Courtroom 623; (ii) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Paul V. Shalhoub, Esq. and Todd G. Cosenza, Esq.) and Rollin Braswell Fisher LLC, 8350 East Crescent Parkway, Suite 100, Greenwood Village, Colorado 80111 (Attn: Michael A. Rollin, Esq. and Maritza D. Braswell, Esq.), attorneys for LBHI and certain of its affiliates; (iii) Becker, Glynn, Muffly, Chassin & Hosinski LLP, 299 Park Avenue, New York, New York 10171 (Attn: Chester B. Salomon, Esq. and Alec P. Ostrow, Esq.) and Gibbs & Bruns, LLP, 1100 Louisiana, Suite 5300, Houston, Texas 77002 (Attn: Kathy D. Patrick, Esq., Robert J. Madden, Esq. and David Sheeren, Esq.), attorneys for the Institutional Investors; (iv) Chapman & Cutler LLP, 111 West Monroe Street, Chicago, Illinois 60603 (Attn: Franklin H. Top III, Esq. and Scott A. Lewis, Esq.), Morgan, Lewis & Bockius LLP, 101 Park Avenue, New York, New York 10178 (Attn: Michael S. Kraut, Esq.), Seward & Kissel LLP, One Battery Park Plaza, New York, New York 10004 (Attn: M. William Munno, Esq. and Daniel E. Guzman, Esq.), Alston & Bird LLP, 1201 West Peachtree Street, Suite 4900, Atlanta, Georgia 30309 (Attn: John C. Weitnauer, Esq.), Holwell Shuster & Goldberg LLP, 750 Seventh Avenue, 26th Floor, New York, New York 10019 (Attn: Michael S. Shuster, Esq.), and Nixon Peabody LLP, 437 Madison Avenue, New York, New York 10022 (Attn: Dennis J. Drebsky, Esq.), attorneys for the Trustees; (v) Kasowitz Benson Torres LLP, 1633 Broadway, New York, New York 10019 (Attn: Daniel A. Fliman, Esq. and Michael A. Hanin, Esq.) and Clarick Gueron Reisbaum LLP, 220 Fifth Avenue, 14th Floor, New York, New York 10001 (Attn: Nicole Gueron, Esq. and Isaac B. Zaur, Esq.), attorneys for the Investor Group; and (vi) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan D. Golden, Esq., and Andrea B. Schwartz, Esq.); **so as to be**

actually filed and received no later than June 23, 2016 at 4:00 p.m. (prevailing Eastern Daylight Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no objections are timely received and filed by the Objection Deadline, the Proposed Intervention Order may be approved and signed without further notice or a hearing.

PLEASE TAKE FURTHER NOTICE that if an objection is timely received and filed by the Objection Deadline, a hearing on the Intervention Motion has been scheduled before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 623, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”) on **July 6, 2017 at 10:00 a.m. (prevailing Eastern Daylight Time).**

Dated: June 9, 2017
New York, New York

By: /s/ Alec P. Ostrow
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